UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON, ET ALS	:	
	:	
vs.	:	C.A. No. 03-335-L
	:	
AMERICAN FOAM CORPORATION, ET ALS	:	
	:	

APPLICABLE TO PLAINTIFF, MICHELLE SPENCE, ONLY

DEFENDANT, MICHAEL DERDERIAN'S, ANSWER

Michael Derderian is presently charged in indictment K1 03-655A with two hundred counts of involuntary manslaughter as a result of the fire that occurred on February 20, 2003 at the Station Nightclub. Similar matters are included within the scope of the allegations of the First Amended Master Complaint and plaintiff's Notice of Adoption. Under these circumstances, Michael Derderian expressly asserts his rights under the Fifth Amendment to the United States Constitution and Article 1, Section 13 of the Rhode Island Constitution ("Privilege") to the fullest extent possible in response to the First Amended Master Complaint and plaintiff's Notice of Adoption and respectfully declines to answer the allegations contained in the First Amended Master Complaint and plaintiff's Notice of Adoption for that reason.

The plaintiff has adopted the first amended master complaint in *Albert L. Gray, Administrator, et al v. Jeffrey Derderian, et al*, C.A. No. 04-312L. The defendant, Michael Derderian, hereby incorporates by reference his answer filed on his behalf as his answer as if set forth fully herein.

The defendant, Michael Derderian, is without sufficient information to admit or deny the additional allegations set forth in plaintiff's notice of adoption.

211

MICHAEL DERDERIAN
By his attorney,

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THE DEFENDANT, MICHAEL DERDERIAN, HEREBY DEMANDS A TRIAL BY JURY.

Anthony F. DeMarco, Esquire #0799

CERTIFICATION

I hereby certify that on the 4th day of February, 2005, I e-mailed a copy of the within to the following attorneys of record:

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